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MEMO ENDORSED

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 Columbia application pending. Supervised by
 Martin F. McMahon, a member of the D.C.
 Bar.

December 1, 2009

VIA FEDERAL EXPRESS AND FACSIMILE

The Honorable Frank Maas
 United States Magistrate Judge
 United States Court for the Southern District of New York
 Daniel Patrick Moynihan United States Courthouse
 500 Pearl Street, Room 740
 New York, NY 10007-1312

*If successor counsel files a notice
 of appearance, I will grant
 Mr. Martin's motion and
 adjourn the 12/4/09 conference
 to permit the new attorney to become
 familiar with the case. If not, the*

Re: In re Terrorist Attacks on September 11, 2001, MDL 03-1570 (GBD) (FM)

*conference will proceed as previously
 scheduled. JM, USMT, 12/1/09*

Dear Judge Maas;

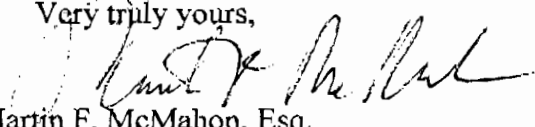
I write to inform you of an update our firm received regarding the hearing scheduled for December 4, 2009 and Sanabel Al Kheer's efforts to retain new counsel in advance of the hearing. We have been informed that they identified prospective new counsel who they intend to retain, however, their prospective new counsel is presently out of town.

Accordingly, we request on behalf of Sanabel Al Kheer that a brief continuance of the hearing be granted to allow time for Sanabel Al Kheer's new counsel to enter an appearance and adequately familiarize himself with the discovery dispute to be addressed at the hearing. We understand that new counsel intends to contact the court and our firm upon his return to begin the process of preparing for the hearing. As the termination of our firm by Sanabel Al Kheer severely limits our authority to act on behalf of the organization if we were to appear at the December 4, 2009, we believe a brief continuance allowing new counsel to participate fully in the near future would be a reasonable resolution under the circumstances.

Please advise whether it will be possible to reschedule the conference. At present we have not yet communicated with Plaintiffs' counsel, however we are aware that Plaintiffs have

opposed our motion to withdraw pending new counsel entering an appearance. Counsel for the Plaintiffs (listed below) have been sent a copy of this letter by electronic mail.

Very truly yours,


Martin F. McMahon, Esq.

CC: Counsel for Plaintiffs (Sean Carter, Jerry Goldman, James Kreindler, Andrew Maloney, and Robert Haefele) and counsel for Mr. Mirza (Steven Barentzen)